

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**DTE 01-39**

**Respondent:** Lynelle J. Reney

**Title:** Director

**REQUEST:** AT&T Communications of New England & Covad  
Communications, Inc., Set #1

**DATED:** June 6, 2001

**ITEM:** ATT/Covad 1-1 Referring to pages 2 –3 of the Answer of Verizon Massachusetts to the Complaint in this proceeding, Verizon states “before evidentiary hearings even began in D.T.E. 98-57, Verizon MA witnesses testified concerning the manner in which Verizon MA applied power charges.”

- a) Identify all witnesses referred to in this statement;
- b) Identify proceedings in which they testified;
- c) Provide copies of their prefiled testimony;

Identify in each piece of prefiled testimony the specific language to which Verizon’s answer refers;

**REPLY:** The witnesses to whom Verizon MA referred are Amy Stern, who discusses DC power charges on page 46 of her Rebuttal Testimony, which was filed on August 19, 1999, in D.T.E. 98-57. The statement also refers to Ms. Stern and Karen Maguire, both of whom discussed DC power charges as part of their testimony on behalf of Verizon MA during the Department's November 15, 1999 Technical Session in D.T.E. 99-271. Relevant excerpts from Ms. Stern's Rebuttal Testimony and excerpts from transcripts of the November 15 Technical Session [pages 1106 to 1112] are attached.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-39**

**Respondent:** Bruce Lear

**Title:** Senior Specialist

**REQUEST:**

AT&T Communications of New England & Covad  
Communications, Inc., Set #1

**DATED:**

June 6, 2001

**ITEM:** ATT/Covad 1-2

Referring to pages 2 –3 of the Answer of Verizon Massachusetts to the Complaint in this proceeding, Verizon states “before evidentiary hearings even began in D.T.E. 98-57, . . . Verizon MA provided CLECs with information regarding the charges.”

- a) Identify all occasions in which Verizon provided AT&T and Covad with such information;
- b) Identify the approximate dates when such information was provided to AT&T and Covad;
- c) Identify the names and titles of the Verizon representatives who provided such information;
- d) Identify the names of CLECs other than AT&T and Covad and the individual representatives of each such CLEC who received such information;
- e) Provide copies of the information provided.

**REPLY:**

In an Industry Letter dated 4/15/99, Verizon supplied the entire CLEC community with information regarding revisions to Tariffs 14 and 17 made in compliance with the Department’s Order dated March 12, 1999 in Docket No. 98-57. Included in that filing were the terms and conditions for collocation and applicable DC power charges. The industry letter was made publicly available since the time of its issuance at <http://128.11.40.241/east/wholesale/resources/master.htm>

This letter advised the CLEC community to forward questions regarding the letter and charges to their assigned Verizon (then, Bell Atlantic) Account Manager.

**REPLY:** ATT/Covad 1-2  
(cont'd)

In addition to the Account Manager the CLEC could also contact its Collocation Project Manager in order to inquire about the industry letter and other collocation issues. A copy of the industry letter is attached.

See also Verizon MA's response to ATT/Covad 1-1.

VZ # 2

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-39**

**Respondent:** Lynelle J. Reney

**Title:** Director

**REQUEST:** AT&T Communications of New England & Covad  
Communications, Inc., Set #1

**DATED:** June 6, 2001

**ITEM:** ATT/Covad 1-3 Referring to page 4 of the Answer of Verizon Massachusetts to the Complaint in this proceeding, Verizon states that "AT&T and Covad received multiple explanations concerning the application of the charges while the tariff was being reviewed before Department approval."

- a) Identify all such "multiple occasions," by the proceeding or other occasion, in which such explanations were provided;
- b) Identify the approximate dates when such explanations were provided to AT&T and Covad;
- c) Identify the names and titles of the Verizon representatives who provided such explanations;
- d) Describe the substance of such explanations;
- e) If such explanations were written or transcribed, provide copies.

**REPLY:** Verizon objects to this request to the extent it seeks specific names, dates and the substance of every occasion to which Verizon provided explanations regarding the application of DC power charges. Identifying specific names and dates as well as the substance of each of these communiqués would be unduly burdensome.

Subject to the foregoing objection and without waiving it, Verizon states that in the course of discovery in MA D.T.E. Docket 98-57 Verizon provided extensive information on the

**REPLY:** ATT/Covad 1-3  
(cont'd)

charges contained in Tariff 17 in response to data requests issued by parties to that proceeding, including AT&T and Covad. In addition, both Verizon's Project Managers and Account Managers were available to discuss the application of the charges. Verizon's Account Managers and Project Managers regularly answer numerous questions concerning these type issues on a daily basis.

VZ # 3

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-39**

**Respondent:** Bruce Lear

**Title:** Senior Specialist

**REQUEST:** AT&T Communications of New England & Covad  
Communications, Inc., Set #1

**DATED:** June 6, 2001

**ITEM:** ATT/Covad 1-4 Referring to pages 7-8 of the Answer of Verizon Massachusetts to the Complaint in this proceeding, Verizon quotes from its letter to the Department dated February 1, 2001 that the proposed change in D.T.E. Tariff 17 regarding DC power rates “was intended to address an issue that was raised in Verizon MA’s initial 271 filing with the FCC regarding the application of power rates.” Verizon then “denies the allegations to the extent it implies that there is any past or present ‘issues’ regarding DC power which the Department need address.” Please explain and reconcile the apparent inconsistencies in the two statements quoted.

**REPLY:** There is no inconsistency between the referenced quotes. While Verizon MA proposed the January 12<sup>th</sup> Revisions in an effort to be responsive to issues raised by CLECs in the context of Verizon MA’s Initial 271 proceedings, Verizon has properly charged CLECs for DC power in accordance with the terms of its approved Tariff 17. CLEC arguments to the contrary are without merit. Therefore, there is no “issue” regarding DC power that the Department needs address.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-39**

**Respondent:** Lynelle J. Reney  
**Title:** Director

**REQUEST:** AT&T Communications of New England & Covad  
Communications, Inc., Set #1

**DATED:** June 6, 2001

**ITEM:** ATT/Covad 1-5 Please provide in detail the basis for Verizon's belief, as stated  
on page 9 of its Answer, that "the Complainants may have  
incorrectly ordered power."

**REPLY:** Verizon has provided Covad, AT&T and other CLECs  
maintaining collocation arrangements in Massachusetts with  
DC power in accordance with the applicable tariff and industry  
standards. While Verizon's collocation application is clear and  
unambiguous, in some instances Verizon has identified errors  
made by CLECs on these applications and/or had to query  
CLECs in order to clarify the amount of power being ordered on  
an application. In addition, CLECs have and continue to request  
to modify the amount of power ordered to their collocation  
arrangements both during and subsequent to the provisioning  
process.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-39**

**Respondent:** Lynelle J. Reney

**Title:** Director

**REQUEST:** AT&T Communications of New England & Covad Communications, Inc., Set #1

**DATED:** June 6, 2001

**ITEM:** ATT/Covad 1-6 Please describe how "CLECs in Massachusetts have an opportunity to review their applications with Verizon MA to understand how all rates would be applied to their collocation arrangements," as stated on page 9 of Verizon's Answer.

- a) Identify such opportunities provided to AT&T;
- b) Identify representatives from Verizon and from AT&T who have communicated together with respect to such application review opportunities;
- c) Identify the approximate dates that such reviews with AT&T occurred;
- d) Describe the substance of the communications with respect to such reviews of AT&T applications;
- e) Identify the specific AT&T Collocation Applications for DC power that were reviewed;
- f) Identify such opportunities provided to Covad;
- g) Identify representatives from Verizon and from Covad who have communicated together with respect to such application review opportunities;
- h) Identify the approximate dates that such reviews with Covad occurred;
  - i) Describe the substance of the communications with respect to such reviews of Covad applications;



- j) Identify the specific Covad Collocation Applications for DC power that were reviewed.

**REPLY:** ATT/Covad 1-6

Verizon objects to this request to the extent it seeks information regarding every opportunity AT&T or Covad have had to review their collocation applications with Verizon and every communication between Verizon and AT&T or Covad regarding such opportunities for review. Verizon meets on a formal and informal basis with numerous carriers on a regular basis to address various issues relating to their collocation applications, as well as many other matters, and does not maintain detailed records of the occurrence and substance of every interaction with a CLEC. Moreover, even where such information exists, identification of every single communication between Verizon and AT&T or Covad regarding these matters would require a substantive review of every record of a communication between Verizon and AT&T or Covad, regardless of form, and would therefore be unduly burdensome.

Subject to the foregoing objection, Verizon states that each CLEC is assigned a Collocation Project Manager to assist them with all their collocation needs. This Project Manager is available to answer questions on how to complete an application, review a completed application before it is submitted and explain how tariff rates are applied. CLECs are reminded to contact their Project Manager to discuss any issues or questions in the Acknowledgement letter that is sent to the CLEC upon receipt of each collocation application. This letter provides the name and contact number of the Project Manager assigned to the CLEC. The Collocation Project Manager's name and telephone number are again provided in the Schedule letter that advises them of the date due of their collocation arrangement.

**Verizon New England Inc.  
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**Commonwealth of Massachusetts**

**D.T.E. 01-39**

**Respondent:** Lynelle J. Reney

**Title:** Director

**REQUEST:**

AT&T Communications of New England & Covad  
Communications, Inc., Set #1

**DATED:**

June 6, 2001

**ITEM:** ATT/Covad 1-7

Identify CLECs who, prior to the date of the filing of the Complaint in this proceeding, have "revised their original power requirements after these discussions," as stated on page 9 of Verizon's Answer, including:

- a) how such power requirements were revised, particularly in terms of amps requested, feeds requested, and fusing of feeds;
- b) the approximate dates such revisions occurred;
- c) and provide the documentation from the CLEC supporting such revision request.

**REPLY:**

Verizon objects to this request to the extent it seeks information regarding the specific DC power requirements of other collocated CLECs or the details of their collocation applications because this information is confidential and/or proprietary. Furthermore, providing this information would require Verizon to review virtually every collocation application and would therefore be unduly burdensome.

Subject to the foregoing objection, the identity of CLECs who altered their DC power arrangements in Massachusetts prior to February 22, 2001, may be information which they do not wish released on the public record or to their competitors. Accordingly, the names of the CLECs is being provided solely to the Department.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-39**

**Respondent:** Lynelle J. Reney

**Title:** Director

**REQUEST:**

AT&T Communications of New England & Covad  
Communications, Inc., Set #1

**DATED:**

June 6, 2001

**ITEM:** ATT/Covad 1-8

Identify CLECS and respective collocation arrangements in which “the maximum amount of power that their equipment can draw” has not been identified to Verizon, as stated on page 9 of Verizon’s Answer.

**REPLY:**

Verizon objects to this request to the extent it requests that Verizon identify every CLEC and every collocation arrangement in which “the maximum amount of power that their equipment can draw” was not identified to Verizon. Providing this information would require Verizon to review virtually every collocation application and would be unduly burdensome.

Subject to the foregoing objections and without waiving them, Verizon states that while it requests that CLECs provide the amount of DC power each piece of equipment being placed in the collocation arrangement can draw, not all CLECs comply with this request. In addition, when CLECs do provide information on this point, the total amount of DC power required by the equipment is often significantly less than the DC power capacity ordered.

**Verizon New England Inc.  
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**Commonwealth of Massachusetts**

**D.T.E. 01-39**

**Respondent:** Bruce Lear

**Title:** Senior Specialist

**REQUEST:**

AT&T Communications of New England & Covad  
Communications, Inc., Set #1

**DATED:**

June 6, 2001

**ITEM:** ATT/Covad 1-9

Provide copies of any and all reports, compilations, analyses and spreadsheets based on data collected in February 2001 of power feeds serving CLECs, referred to on page 10 of Verizon's Answer. Identify and provide all original data from such data collection activities related to collocation arrangements of the plaintiffs in this proceeding, including but not limited to the specific drained amps provided on each feed to the plaintiffs.

**REPLY:**

See Verizon Massachusetts 271, Lacouture/Ruesterholz  
Supplemental Reply Declaration Attached – Redacted Version.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-39**

**Respondent:** Bruce Lear  
**Title:** Senior Specialist

**REQUEST:** AT&T Communications of New England & Covad  
Communications, Inc., Set #1

**DATED:** June 6, 2001

**ITEM:** ATT/Covad 1-10 Provide a basis for the statement on page 10 of Verizon's Answer  
that an "A&B Feed Pair" "reflects engineering practice and the  
historic industry preference."

- a) Provide copies of all manuals, handbooks, contracts,  
memoranda or other written source for this claim concerning  
engineering practice and historic industry preference;
- b) Identify the person at Verizon who was the source for the  
information that an "A&B Feed Pair" "reflects engineering  
practice and the historic industry preference."

**REPLY:**

- a) See Verizon MA's response to ATT/Covad 1-12.
- b) See Verizon MA's response to ATT/Covad 1-13.

**Verizon New England Inc.  
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**Commonwealth of Massachusetts**

**D.T.E. 01-39**

**Respondent:** Bruce Lear  
**Title:** Senior Specialist

**REQUEST:** AT&T Communications of New England & Covad  
Communications, Inc., Set #1

**DATED:** June 6, 2001

**ITEM:** ATT/Covad 1-12 With respect to “established engineering practices,” “established engineering principles” and “established industry practice” referred to in paragraphs 13 and 14 of Verizon’s Answer, provide copies of excerpts from manuals, handbooks or memoranda that support Verizon’s practice of fusing feeds at capacities up to 1.5 times loads.

**REPLY:** See Bell System Practices 790-100-656 and Bell Atlantic Practices BA 790-600-500 attached. These documents are proprietary and will be made available to parties subject to the terms of a mutually agreeable protective agreement.

See also National Electric Code, Handbook 1996, Article 240 and in addition, vendor manufacturers technical specifications also define fusing requirements.

In addition, Section 7 of Bell Atlantic Practices BA 790-600-500 provides a listing of Bellcore Technical References that are shown below. Copies of Bellcore Technical references must be obtained directly from Bellcore.

GR-512-CORE – Reliability  
GR-513-CORE – LSSGR:Power  
GR-63-CORE – Network Equipment Building Systems(NEBS)  
GR-1089-CORE Electromagnetic Compatibility and Electrical  
Safety-Generic Requirements

**REPLY:** ATT/Covad 1-12  
(cont'd)

TR-NWT-000078 – Generic Physical Design Requirements for  
Telecommunications Products and  
Equipment  
TR-TSY-000191 – Alarm Indication Signal Requirements and  
Objectives  
TR-EOP-000221 – Interface and Functional requirements for  
Central Office Power Plants  
TA-TSY-000894 – Universal Interface for Central Office Power  
Plants  
TR-NWT-000928 - Mountable Fuse Panels Used in Central  
Offices  
GR-1252-CORE – Quality Systems Generic Requirements for  
Hardware  
GR-929-CORE – Reliability and Quality Measurements for  
Telecommunications Systems (RQMS)  
TR-NWT-000357 – Component Reliability Assurance  
Requirements for Telecommunications  
Equipment  
GR-209-CORE – Guideline for Product Change Notice  
GR-230-CORE – Engineering Complaints and Operational  
Trouble Report  
QPS 70.001/3 – Quality Assurance Related Buyer-Supplier  
Understandings/Agreements (General)  
QPS 70.002/6 – Process Quality Audit  
QPS 70.003/1 – Surveillance Inspection (general)  
ANSI/ASQC Q9000-1 – Quality Management and Quality  
Assurance Standards  
ANSI/ASQC Q9001 – Model for Quality Assurance in  
Design/Development and Production  
ANSI/ASQC Q9003 – Model for Quality Assurance in Final  
Inspection and Test  
QPS 74.311 – Repair Product Process Verification/Inspection  
QPS 82.061 – QPS for Repair and Return Operations of  
Telecommunications Products  
QPS 82.052 – Wired Equipment – General  
QPS 97.500 – Quality Program Specification:Power Wire  
products – Generic Requirements for Rack-

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**D.T.E. 01-39**

**Respondent:** Bruce Lear

**Title:** Senior Specialist

**REQUEST:** AT&T Communications of New England & Covad  
Communications, Inc., Set #1

**DATED:** June 6, 2001

**ITEM:** ATT/Covad 1-13 Identify procedures, work orders or directives used by Verizon to determine and provide the capacity of fuses used for given levels of load amps on feeds requested by CLECs, and identify, by name, title, department, experience and training, the Verizon personnel who make such determinations for feeds provided to the defendants.

**REPLY:** See Verizon Mass response ATT/Covad 1-12 for procedures, work orders or directives used by Verizon to determine and provide the capacity of fuses used for given levels of load amps on feeds requested by CLECs.

Verizon MA has over 1000 people involved in Power Planning, Network Power Maintenance, Power Assistance, Power Maintenance Engineering and Equipment Installation. The Equipment Installation Technicians involved in this count are those individuals who are power rated or perform power installation work.

The following courses are attended by new power engineers: Central Office Power Fundamentals – provides insight into the operation and relationship of various components found in a central office power plant environment. The course covers the skills necessary for installing or accepting power jobs from vendors. Power plant cabling of shared and non-shared power plants is covered to ensure proper operation of equipment powered from these plants.

Power Engineering-Direct Current – discusses how to plan for new power plants and central office power additions. Exercises



**REPLY:** ATT/Covad 1-13  
(cont'd)

cover sizing of conductors for DC distribution, along with battery and rectifier casework, to reinforce your understanding.

Power Engineering – Alternating Current – provides insight into the operation and relationship of various Alternating Current (AC) power components found in a central Office.

Power Maintenance – Direct Current – offers a basic background and understanding of central office power equipment. Casework and lab visits reinforce your understanding of power equipment in a central office.

Telecommunications Grounding – includes the latest standards for grounding requirements of telecommunications equipment and buildings. The course is for both installation and telecommunications company personnel who are responsible for the installation or acceptance of installation projects. Grounding provides you with the knowledge to protect both employees and equipment.

There are other training courses not described above that are offered and available for power training. In addition seminars are also scheduled and held on a regular basis for Verizon power employees.

**Verizon New England Inc.  
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**Commonwealth of Massachusetts**

**D.T.E. 01-39**

**Respondent:** Bruce Lear  
**Title:** Senior Specialist

**REQUEST:** AT&T Communications of New England & Covad  
Communications, Inc., Set #1

**DATED:** June 6, 2001

**ITEM:** ATT/Covad 1-14 Explain how precise fuse capacities on feeds are determined  
within the range of capacities that are 1.25 to 1.50 times the load  
amps, as stated in paragraph 14.

**REPLY:** See Verizon MA's response to 1-12.

VZ # 14

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-39**

**Respondent:** Lynelle J. Reney  
**Title:** Director

**REQUEST:** AT&T Communications of New England & Covad  
Communications, Inc., Set #1

**DATED:** June 6, 2001

**ITEM:** ATT/Covad 1-15 Provide a copy of Verizon's collocation cost study, referred to in  
paragraph 29 of Verizon's Answer.

**REPLY:** See Attached: Collocation Cost Study.xls

**Verizon New England Inc.  
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**Commonwealth of Massachusetts**

**D.T.E. 01-39**

**Respondent:** Lynelle J. Reney

**Title:** Director

**REQUEST:**

AT&T Communications of New England & Covad  
Communications, Inc., Set #1

**DATED:**

June 6, 2001

**ITEM:** ATT/Covad 1-16

Identify, by name, title, department, experience and training, the Verizon personnel who drafted and approved the Collocation Application form.

**REPLY:**

The development of and on going revisions to the Collocation Application is a collaborative effort and includes numerous representatives from Network Engineering, Central Office Engineering, Outside Plant, Product Line Management, Legal, Program One, State and Federal Regulatory, Operations and Wholesale Services. The actual individuals vary depending upon the section of the application being developed or revised and have changed over time. Wholesale Services is responsible to compile all inputs to the document and arrange for publication on the Verizon web site.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-39**

**Respondent:** Lynelle J. Reney

**Title:** Director

**REQUEST:** AT&T Communications of New England & Covad Communications, Inc., Set #1

**DATED:** June 6, 2001

**ITEM:** ATT/Covad 1-17 Referring to the Collocation Application form in use prior to the filing of this Complaint:

- a) Explain how a CLEC can request on the application a single A feed, but not a B feed;
- b) Explain how a CLEC can request on the application an odd, rather than even, number of A (or B) feeds;
- c) Is it possible for a CLEC to request, by means of the application, a specific amount of DC power in load amps, independent from the number of feeds it requests? If so, what is the procedure for doing so, and how is a CLEC to know of this procedure?

**REPLY:** The 'Remarks' section of the application provides the CLEC the opportunity to request modifications that the application proper may not provide for.

Instructions on the remarks section are included in Verizon's Application Instructions found at

<http://128.11.40.241/east/wholesale/resources/master.htm>

These instructions advise the CLEC that this section is to be populated with additional information that the CLEC would like to convey to Verizon.

In certain instances, CLECs such as AT&T, have elected to prepare detailed specifications delineating their specific DC power requirements as opposed to utilizing either the DC power or remarks section of the Collocation Application. Verizon will provide samples of such AT&T specifications if AT&T waives confidential treatment for this information or subject to terms of a mutually acceptable confidentiality agreement.

VZ #17

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-39**

**Respondent:** Lynelle J. Reney

**Title:** Director

**REQUEST:** AT&T Communications of New England & Covad  
Communications, Inc., Set #1

**DATED:** June 6, 2001

**ITEM:** ATT/Covad 1-18      Apart from the Collocation Application, what is the procedure, if any, by which a CLEC may request an amount of power in load amps, independent from the number of feeds it requests?

**REPLY:**      The CLECs can and have utilized their collocation Project Manager and/or Account Manager to set up regular face to face meetings or conference calls to discuss any number of issues including the procedure by which to order DC power. Verizon has also recently developed a Power Reduction Request Form that CLECs may use to revise the amount of power at their existing collocation arrangements.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-39**

**Respondent:** Lynelle J. Reney

**Title:** Director

**REQUEST:** AT&T Communications of New England & Covad Communications, Inc., Set #1

**DATED:** June 6, 2001

**ITEM:** ATT/Covad 1-20 Other than tariff language provided in response to Information Request No. 19(q), please provide each and every other proposed tariff language, as filed with the Department of Telecommunications and Energy, with respect to DC Power charges for collocation arrangements with CLECs from the earliest first effective date of a collocation arrangement with AT&T identified in response to Information Request No. 19(d) until the date of the Complaint filed in this proceeding.

**REPLY:** Verizon objects to this request on grounds that information regarding proposed tariffs is irrelevant.